

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

AUTHORS GUILD, DAVID BALDACCI,  
BELFRY HOLDINGS, INC., MARY BLY,  
COLUMBUS ROSE, LTD., MICHAEL  
CONNELLY, SYLVIA  
DAY, ELOISA JAMES, INC., JONATHAN  
FRANZEN, JOHN  
GRISHAM, HIERONYMUS, INC., ELIN  
HILDERBRAND,  
CHRISTINA BAKER KLINE, S.C.R.I.B.E.,  
INC., SPLENDIDE MENDAX, INC, SYLVIA  
DAY LLC, VICTOR LAVALLE,  
GEORGE R.R. MARTIN, JODI PICOULT,  
DOUGLAS PRESTON, ROXANA ROBINSON,  
GEORGE SAUNDERS, SCOTT TUROW, and  
RACHEL VAIL, individually and on behalf of  
others similarly situated,

Plaintiffs,

v.

OPEN AI INC., OPENAI OPCO LLC, OPENAI  
GP LLC, OPENAI, LLC, OPENAI GLOBAL  
LLC, OAI CORPORATION LLC, OPENAI  
HOLDINGS LLC, OPENAI STARTUP FUND I  
LP, OPENAI STARTUP FUND GP I LLC,  
OPENAI STARTUP FUND MANAGEMENT  
LLC, and MICROSOFT CORPORATION,

Defendants.

JONATHAN ALTER, KAI BIRD, TAYLOR  
BRANCH, RICH COHEN, EUGENE LINDEN,  
DANIEL OKRENT, JULIAN SANCTON,  
HAMPTON SIDES, STACY SCHIFF, JAMES  
SHAPIRO, JIA TOLENTINO, TOUGH JEWS,  
INC., and SIMON  
WINCHESTER, on behalf of themselves and all  
others similarly situated,

Plaintiffs,

**ECF CASE**

No. 1:23-cv-08292-SHS;  
No. 1:23-cv-10211-SHS

**JURY TRIAL DEMANDED**

v.

OPEN AI INC., OPENAI OPCO LLC, OPENAI GP LLC, OPENAI, LLC, OPENAI GLOBAL LLC, OAI CORPORATION LLC, OPENAI HOLDINGS LLC, OPENAI STARTUP FUND I LP, OPENAI STARTUP FUND GP I LLC, OPENAI STARTUP FUND MANAGEMENT LLC, and MICROSOFT CORPORATION,

Defendants.

### **AUTHOR PLAINTIFFS' MOTION TO SEAL**

Under paragraph 25 of the Stipulated Protective Order in this case (Dkt. 338), Author Plaintiffs respectfully seek to provisionally file under seal portions of their letter motion to compel and exhibits B-I in support. The letter motion seeks a conference to discuss a discovery dispute—specifically, Author Plaintiffs seek an Order compelling OpenAI to produce the documents they have already produced to the News Plaintiffs from the custodial files of Michael Lampe, Brad Lightcap, and Wojciech Zaremba. The Author Plaintiffs seek to file portions of this letter motion under seal because exhibits B-I to the motion include and discuss documents that Defendants have designated as Protected Discovery Material under the Protective Order. Dkt. 338 ¶ 25. The Author Plaintiffs do not affirmatively seek to seal any material. Under the Protective Order, Defendants have five business days to file a statement of reasons for why the material should be sealed. *Id.* The Author Plaintiffs will review Defendants' filings, and if necessary, confer about any disagreement.

Dated: March 31, 2025

/s/ Rachel Geman

Rachel Geman  
Anna J. Freymann  
Wesley Dozier (*pro hac vice*)  
LIEFF CABRASER HEIMANN &  
BERNSTEIN, LLP  
250 Hudson Street, 8<sup>th</sup> Floor  
New York, NY 10013  
Tel.: 212.355.9500  
rgeman@lchb.com  
afreymann@lchb.com  
wdozier@lchb.com

Reilly T. Stoler (*pro hac vice*)  
LIEFF CABRASER HEIMANN &  
BERNSTEIN, LLP  
275 Battery Street, 29th Floor  
San Francisco, CA 94111  
Tel.: 415.956.1000  
rstoler@lchb.com

/s/ Scott J. Shoulder

Scott J. Shoulder  
CeCe M. Cole  
COWAN DEBAETS ABRAHAMS &  
SHEPPARD LLP  
60 Broad Street, 30th Floor  
New York, NY 10010  
Tel.: 212.974.7474  
sshoulder@cdas.com  
ccole@cdas.com

/s/ Rohit D. Nath

Justin A. Nelson (*pro hac vice*)  
Alejandra C. Salinas (*pro hac vice*)  
Amber Magee (*pro hac vice*)  
SUSMAN GODFREY L.L.P.  
1000 Louisiana Street, Suite 5100  
Houston, TX 77002  
Tel.: 713.651.9366  
jnelson@susmangodfrey.com  
asalinas@susmangodfrey.com  
amagee@susmangodfrey.com

Rohit D. Nath (*pro hac vice*)  
SUSMAN GODFREY L.L.P.  
1900 Avenue of the Stars, Suite 1400  
Los Angeles, CA 90067  
Tel.: 310.789.3100  
rnath@susmangodfrey.com

J. Craig Smyser  
Charlotte Lepic  
SUSMAN GODFREY L.L.P.  
One Manhattan West, 51st Floor  
New York, NY 10001  
Tel.: 212.336.8330  
csmyser@susmangodfrey.com  
clepic@susmangodfrey.com

Jordan W. Connors (*pro hac vice*)  
SUSMAN GODFREY L.L.P.  
401 Union Street, Suite 3000  
Seattle, WA 98101  
Tel.: 206.516.3880  
jconnors@susmangodfrey.com

***Interim Class Counsel***

**CERTIFICATE OF SERVICE**

I hereby certify this 31<sup>st</sup> day of March, 2025, I caused a true and correct copy of the foregoing to be electronically filed with the Clerk of the court using the CM/ECF system which will send notification to the attorneys of record and is available for viewing and downloading.

/s/ Rohit D. Nath

(Signature)